

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

PAULA GABRIEL,)	Civil Case No. 2:21-cv-687
)	
Plaintiff,)	
)	HONORABLE PATRICIA L. DODGE
v.)	
)	
XYLEM, INC., XYLEM WATER)	
SOLUTIONS ZELIENOPLE, LLC)	
MICHEAL CRAIG and SEAN)	
PETRAITIS,)	
)	
Defendants.)	

MOTION TO VOLUNTARILY DISMISS PLAINTIFF’S AMENDED COMPLAINT

COMES NOW, the Plaintiff, PAULA GABRIEL, by and through her attorneys, LAW OFFICES OF JOEL SANSONE, JOEL S. SANSONE, ESQUIRE, MASSIMO A. TERZIGNI, ESQUIRE, and ELIZABETH A. TUTTLE, ESQUIRE, and hereby files this Motion to Voluntarily Dismiss Plaintiff’s Amended Complaint as follows:

1. Plaintiff filed her original Complaint on May 21, 2021.
2. Plaintiff filed an Amended Complaint on October 18, 2021.
3. Defendants Xylem, Inc., and Xylem Water Solutions Zelienople LLC filed their Answer to Plaintiff’s Amended Complaint on November 1, 2021.
4. Plaintiff now seeks to voluntarily dismiss her Amended Complaint, with prejudice.

WHEREFORE, Plaintiff respectfully requests that her Amended Complaint be dismissed with prejudice, pursuant to Federal Rule of Civil Procedure 41 (a)(2).

Respectfully submitted,

LAW OFFICES OF JOEL SANSONE

s/ Joel S. Sansone

Joel S. Sansone, Esquire

PA ID No. 41008

Massimo A. Terzigni, Esquire

PA ID No. 317165

Elizabeth A. Tuttle, Esquire

PA ID No. 322888

Counsel for Plaintiff

Law Offices of Joel Sansone

Two Gateway Center, Suite 1290

603 Stanwix Street

Pittsburgh, Pennsylvania 15222

412.281.9194

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